

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

BISOUS BISOUS LLC,

Plaintiff,

v.

THE CLE GROUP, LLC, *et al.*,

Defendants.

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C.A. No. 3:21-cv-01614-B

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE ANSWERS TO PLAINTIFF'S SECOND AMENDED COMPLAINT**

Defendants The Cle Group, LLC, Bisou Uptown Manager, LLC, and Bisou LP Holdings, LLC (together, "Defendants") hereby file their unopposed motion with the Court for an Order extending Defendants' deadline to answer Plaintiff's Second Amended Complaint. In support of their motion, Defendants state as follows:

1. Plaintiff effectively filed and served its Second Amended Complaint on Defendants on October 4, 2021 (Dkt. 73).
2. Defendants' Lead Counsel was in trial in Marshall, Texas on that date.
3. Defendants' Lead Counsel tested positive for COVID on October 5, 2021.
4. Defendants' Lead Counsel was in quarantine for COVID or recovering from complications due to COVID from October 5 through October 17, 2021.
5. Defendants The Cle Group, LLC and Bisou Uptown Manager, LLC's Answers were due on October 18, 2021.

6. Defendant Bisou LP Holdings, LLC's Answer is currently due on Monday, October 25, 2021.
7. Counsel for all parties conferred on October 25, 2021, and agreed to extend the deadline for all defendants to answer the Second Amended Complaint until October 29, 2021.
8. Counsel for all parties additionally agreed that Plaintiff's deadline to respond to Defendants' First Sets of Interrogatories and Requests for Production would also be extended to Friday, October 29, 2021.
9. Defendant Bisou LP Holdings, LLC hereby waives formal service of Plaintiff's Second Amended Complaint and acknowledges that service via ECF on October 4, 2021 was sufficient.
10. Defendants' motion is not filed for delay or any other improper purpose.

For foregoing reasons, Defendants respectfully request that their unopposed motion for extension of time to respond to Plaintiff's Second Amended Complaint be granted.

Dated: October 25, 2021

Respectfully submitted,

BUETHER JOE & COUNSELORS, LLC

By: /s/ Kenneth P. Kula

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5.1(d) on this 25th day of October, 2021.

/s/ Kenneth P. Kula
Kenneth P. Kula